REMARKS

Claims 2-5, 7-13, 15-17, 21-23, 26, 28, and 30 are pending in this application and stand rejected. Claims 6 and 18 have been cancelled in this response. Claims 3, 15, and 21 have been amended. The Applicants respectfully ask for the Examiner's thoughtful reconsideration in light of the following remarks.

The Applicants specifically draw the Examiner's attention to the rejections of Claims 21, 28, and 30. With respect to Claim 21 the Examiner refers to nonexistent figures and or reference numbers in the prior art and also neglects to address all the limitations of claim 21. With respect to Claims 28 and 30 the Examiner neglects to address all the limitations of those Claims.

CLAIM REJECTIONS – 35 USC § 103: The Examiner rejected Claims 2-13, 21-23, 28, and 30 as being unpatentable over USPN 6,463,474 issued to Fuh in view of USPN 5,710,884 issued to Dedrick.

Fuh is directed to a method for enabling a router (210) (in lieu of an authentication server) to authenticate a client (306) attempting to access a network resource (222). *See, e.g.*, Fuh, Abstract and Fig. 4. Fuh, Fig. 4 is reproduced below:

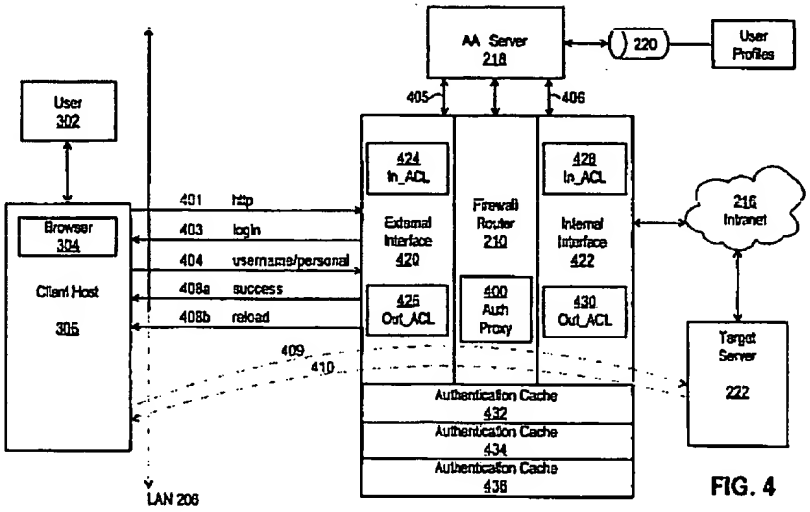

FIG. 4

The following summarizes the method taught by Fuh. The router (210) receives a request from a client (306) to forward a packet to a network resource labeled as target server (222). Fuh, Fig. 7A, step 702. Router (210) examines the packet to determine if the IP address of the client (306) is found in a filtering mechanism. Fuh, Fig. 7A, steps 704 and 706. Assuming that it is, router (210) searches its authentication caches for that IP address. Fuh, Fig. 7A, step 708. If found, the router (210) passes the packet on to the network resource (222). Fuh, Fig. 7A, steps 710 and 712. If not found, the router (210) creates a new authentication cache, requests and receives authentication/log-in information from the client (306), and authenticates the client (306) with a remote authentication server (218) using the log-in information. Fuh, Fig. 7B, steps 720-728. Assuming that authentication is successful, the router (210) updates the newly created authentication cache with data received from the authentication server (218), reconfigures itself, and sends a reload instruction back to the client (306). Fuh, Fig. 7B, steps 730-740. At this stage, the router (210) can locally authenticate the client (306) without needing to access the remote authentication server (218).

Dedrick is directed to a method for storing and updating electronic user information in a personal profile server. *See, e.g., D*edrick, Abstract. The following summary is taken from Dedrick, col. 20, lines 4-29 and Fig. 9. A user is provided with a smart card or other removable non-volatile storage medium. The smart card stores personal profile information for the user. That personal profile information includes data indicating update intervals and identifies the network address of the user's personal profile server that hosts the user's personal profile. The user plugs the smart card into a computer. The computer then uses the network address of the user's personal profile server to access that server and to ultimately retrieve the user's personal profile. The computer then stores the user's personal profile in volatile memory and sends updated profile information back to the user's personal profile server. The computer periodically sends these updates according to the update interval specified by the personal profile information on the smart card.

Claim 3 is directed to a program product including machine readable code for accessing compositions. The product includes:

1. code for providing access to a plurality of user profiles of a single user, with each different user profile including a reference to a composition store and a graphics store wherein, for each user profile, the references to the composition and graphic stores in that user profile are different than the references in each of the other user profiles and wherein at least one user profile is disposed in a first server machine and a second user profile is disposed in a second server machine; and
2. code for selecting one of the plurality of user profiles, wherein the plurality of user profiles or references thereto and the code for selecting are disposed in an imaging client.

With respect to the these two limitations, the Examiner asserts that Fuh discloses:

> code for providing access to a plurality of user profiles with each different user profile (1 2:35 - 40, see ". . . database 220, which contains user profiles of authorized users).
>
> code for selecting one of the plurality of user profiles wherein the plurality of user profiles or references thereto (Fuh, 5: 57 - 6: 15, see client and storage medium).

The Examiner mischaracterizes the first limitation of Claim 3 which recites, in part, "code for providing access to a plurality of user profiles of a single user." In other words a single user has multiple profiles and the code provides access to those profiles for that single user. The Examiner asserts that Fuh discloses "code for providing access to a plurality of user profiles with each different user profile." Even if the Examiner's assertion is correct, the assertion is irrelevant with respect to Claim 1.

To illustrate the Examiner's mistake, the passage of Fuh cited with respect to the first limitation of Claim 3 is reproduced as follows:

> Login information is received from the client, as shown by block 726. Block 726 may involve receiving username and password information in an HTTP message that is generated when a user fills in and submits the form of Table 1. In block 728, the user is authenticated using the login information and the AAA server 218. For example, upon receipt of the username and password information, Authentication Proxy 400 attempts to authenticate the user by sending the username and password to the AAA server 218, as shown by path 405. AAA server 218 has access to database 220, which contains user profiles of authorized users.
>
> In block 730, the process tests whether authentication is successful. Successful authentication will occur when AAA server 218 verifies that the username and password information are recognized and correct.

Fuh, col. 12, lines 27-41.

That passage describes AAA server (218) that has access to database (220) which contains user profiles for authorized users. No further mention is made as to the contents or structure of Fuh's database. One can only presume from the context that Fuh's database (220) contains one profile for each authorized user. Fuh further states that database (220) "stores authentication and authorization information on users ("user profile")." Fuh, col. 8, lines 30-33. Under Fuh's teachings, no purpose would be served by having multiple user profiles associated with a single user. Consequently, Fuh does not disclose "code for providing access to a plurality of user profiles of a single user."

Moreover, Claim 3 has been amended to recite that at least one user profile is disposed in a first server machine and a second user profile is disposed in a second server machine." Fuh's user profiles are disposed in a single database (220) managed by a single server (218)

The Examiner admits that Fuh's user profiles do not include fails to teach "including a reference to a different composition store and a different graphics store and the code for selecting are disposed in an imaging client." For this, the Examiner relies on Dedrick, col. 6, lines 10-35 and col. 17, lines 38-41.

Claim 3 has been amend to recite that "for each user profile, the references to the composition and graphic stores in that user profile are different than the references in each of the other user profiles." Neither Dedrick nor Fuh mention anything of a plurality of user profiles (each containing a reference to a composition store and a

graphics store) where or each user profile, the references to the composition and graphic stores in that user profile are different than the references in each of the other user profiles.

For at least these reasons, Claim 3 is patentable over Fuh and Dedrick as are Claims 2, 4, 5, and 7-13 due at least in part to their dependence from claim 3.

Claim 6 has been cancelled.

Claim 21 is directed to a program product including machine readable code for accessing compositions, comprising:

1. a user profile that includes
    a. a reference to a default internal graphics store behind a firewall;
    b. a reference to a default internal composition store inside the firewall that includes compositions that include a reference to graphics;
    c. a reference to a default external graphics store outside the firewall;
    d. a reference to a default external composition store outside the firewall that includes compositions that include a reference to external graphics;
    e. a reference to a default composition,
2. the product further comprising code in either a profile store or the user profile, the code for invoking a method to select a composition as the default composition,
3. wherein the profile or a reference thereto and the code for invoking the method are disposed in an imaging client.

Rejecting Claim 21, the Examiner makes the following statements, the relevance of which are highly questionable:

Regarding claim 21, Fuh discloses a program product including machine readable code for accessing compositions, comprising:

a reference to a default external graphics store outside the firewall (FIG.4, 424 & 426 also see FIG. 3, 220 for database and firewall 210);

a reference to a default external composition store outside the firewall that includes compositions that include a reference to external graphics (FIG.4, 420,424, 426, FIG. 3, 220 for database and firewall 210);

a reference to a default composition (FIG.7B, 722, see initial state for default composition) further comprising code in either a profile store or the user profile for invoking a method to select a composition as the default composition (FIG.7B, 720 and 722) . Although, Fuh doesn't expressly disclose an internal and external graphics store, and wherein the profile or a reference thereto and the code for invoking the method are in an imaging client, Fuh does show an external an external database (see FIG. 3, 220 behind firewall 210), and also memory storage area for storing information and instructions (internal). Dedrick in an analogous art and similar configuration does however discloses a profile database arid a content database as well as PCMIA flash memory profile card which can be used to store profile information in the clients as well (see 6:10 - 35, also see 17:38 - 41, for contents database which stores graphics) and discloses the use of access control security features to prevent illegal access (15: 5 - 7, as interpreted Equivalent function as a firewall). Therefore it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Fuh and Dedrick because, would enable the user profiles to be more portable and secure (6:32 - 36).

With respect to the element 1.e. – a reference to a default composition – the Examiner refers to a nonexistent FIG.7B, 722 and FIG.7B, 720 and 722. Fuh does not contain a Fig. 7B and, while Dedrick has a Fig. 7b, Dedrick does not use reference numbers 720 or 722. Consequently, the Examiner has failed to show that the references individually or combined teach or suggest a reference to a default composition as recited by Claim 21

Moreover the Examiner has failed to address at least the following elements of Claim 21:

1. a reference to a default internal composition store inside the firewall that includes compositions that include a reference to graphics; and

2. a reference to a default external composition store outside the firewall that includes compositions that include a reference to external graphics.

For at least these reasons, Claim 21 is patentable over Fuh and Dedrick as are Claims 22 and 23 due at least in part to their dependence from Claim 21.

Claim 28 is directed to a method for accessing compositions and recites the following acts:

1. obtaining a user profile that includes
    a. a reference to a first graphics store that meet a first criteria;
    b. a reference to a first composition store that includes compositions that include a reference to graphics, wherein the first composition store meets the first criteria;
    c. a reference to a second graphics store that meets a second criteria;
    d. a reference to a second composition store that includes compositions that include a reference to graphics and wherein the second composition store meets the second criteria;
    e. a reference to a default composition within a composition store; and
2. selecting one of the composition stores based on a criteria, wherein the criteria is an identification of the imaging client machine.

Rejecting claim 28 the Examiner makes the following statements, the relevance of which are highly questionable:

> Regarding claim 28, Fuh discloses a method for accessing compositions, comprising:
>
> obtaining a user profile that includes a reference to a first graphics store that meet a first criteria (Fuh, 12:30 - 35, for criteria see username and password);
>
> a reference to a first composition store that includes compositions that include a reference to graphics, wherein the first composition store

> meets the first criteria (Fuh, 9: 30 - 55, also see FIG.4, 424,428, 426, and 430, and associated text and 12:30 - 35, for criteria see username and password).
>
> Fuh doesn't explicitly disclose a reference to a second composition store that includes compositions that include a reference to graphics. Dedrick in an analogous art and similar configuration does however discloses a profile database and a content database as for storing graphics (see 6:10 - 35, also see 17:38 - 41, for contents database which stores graphics as well). Therefore it would have been obvious to one of ordinary skill in the art: at the time the invention was made to combine Fuh and Dedrick because, would enable the user profiles to be more portable and secure (6:32 - 36).

A comparison of the Examiner's statements with the text of claim 28 reveals that the Examiner has failed to address at least the following elements of Claim 28 rendering the rejection defective:

1. a reference to a second graphics store that meets a second criteria;
2. a reference to a second composition store that includes compositions that include a reference to graphics and wherein the second composition store meets the second criteria; AND
3. a reference to a default composition within a composition store

Consequently, the Examiner has failed to establish that Fuh and Dedrick, alone or combined, teach ALL the limitation of Claim 28. For at least this reason, Claim 28 is patentable over the cited references.

Claim 30 is directed to a system for implementing the method of Claim 28. The Examiner rejected Claim 30 citing the same rationale for the rejection of Claim 28. For the same reasons the rejection of Claim 28 is defective, so is the rejection of Claim 30. Claim 30 is patentable over the cited references.

CLAIM REJECTIONS – 35 USC § 103: The Examiner rejected Claims 2-13, 21-23, 28, and 30 as being unpatentable over USPN 6,463,474 issued to Fuh in view of USPN 5,710,884 issued to Dedrick in further view of USPN 6,820,204 issued to Desai.

Claim 15 is directed to a method for accessing compositions from an imaging client and recites the following acts:

1. providing a first user profile and a second user profile for a single user, with each different user profile including a reference to a composition store and a graphics store, wherein, for each user profile, the references to the composition and graphic stores in that user profile are different than the references in each of the other user profiles and wherein at least one user profile is disposed in a first server machine and a second user profile is disposed in a second server machine; and
2. selecting one of the user profiles based on a criteria, and
3. wherein the first user profile and the second user profile or references thereto are disposed in an imaging client.

Claim 15 differs from Claim 3 in that it recites "providing a first user profile and a second user profile for a single user with each different user profile including a reference to a composition store and a graphics store." Claim 15 is similar in that it recites that "for each user profile, the references to the composition and graphic stores in that user profile are different than the references in each of the other user profiles" and that "at least one user profile is disposed in a first server machine and a second user profile is disposed in a second server machine." As discussed above with respect to claim 3, neither Fuh nor Dedrick, individually or combined) teach or suggest these limitations. Desai is silent with respect to the deficiencies of Fuh and Dedrick.

For at least theses reasons, Claim 15 is patentable over the cited references as are Claims 16 and 17 doe at least in part to their dependence from Claim 15.

Claim 18 has been cancelled.

Claim 26 is directed to a method for accessing compositions and recites the following acts:

1. obtaining a first user profile of a single user including a reference to an first composition store meeting a first criteria and a reference to a first graphic store meeting the first criteria;
2. obtaining a second user profile of the single user including a reference to a second composition store that meets a second criteria and a reference to a second graphic store that meets the second criteria; and
3. selecting one of the first user profile and the second user profile based on a third criteria, wherein the first criteria is that the first composition store and first graphics store is inside a firewall, wherein the second criteria is that the second composition store and second graphics store is outside a firewall, and the third criteria is whether a user imaging client is inside or outside the firewall, and
4. wherein the first user profile and the second user profile or references thereto are in an imaging client.

Rejecting claim 26, the Examiner merely states "see claim 15 for reasoning." Claim 26 recites one or more acts not found in claim 15. Consequently, the "reasoning" with respect to Claim 15 is not sufficient to support a rejection of claim 26. The Examiner's "reasoning" with respect to Claim 15 is silent at to the act of obtaining and selecting as recited in Claim 26. Consequently, the Examiner has failed to establish a prima facie case of obviousness. For at least this reason, Claim 26 is patentable over the cited references.

CONCLUSION: The foregoing is believed to be a complete response to the outstanding Office Action. Claims 2-5, 7-13, 15-17, 21-23, 26, 28, and 30 are felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

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